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Signature Page]**

**IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION**

ENTROPIC COMMUNICATIONS,
LLC,

Plaintiff,

v.

DISH NETWORK CORPORATION, *et
al.*

Defendants.

Case No. 2:23-cv-1043-JWH-KES

**JOINT STIPULATION REGARDING
VENUE DISCOVERY AND
BRIEFING SCHEDULE FOR
DEFENDANTS DISH NETWORK
CORPORATION, DISH NETWORK
L.L.C., AND DISH NETWORK
SERVICE L.L.C.'S MOTION TO
DISMISS FOR IMPROPER VENUE**

Current Hearing Date: Sept. 15, 2023
Time: 10:00 a.m.
Crtrm: 8D (Santa Ana)

Proposed New Date: October 6, 2023
Time: 10:00 a.m.
Crtrm: 8D (Santa Ana)

1 Plaintiff Entropic Communications, LLC (“Plaintiff” or “Entropic”) on the one
2 hand and Defendants DISH Network Corporation, DISH Network, L.L.C., Dish
3 Network Service, L.L.C. (collectively, “DISH Colorado”) and Dish Network
4 California Service Corporation (collectively, “Defendants” and “DISH”) on the other
5 hand (collectively, the “Parties”), by and through their respective counsel stipulate
6 and agree as follows:

7 WHEREAS, DISH Colorado filed a Motion to Dismiss for Improper Venue
8 (the “Motion”) on May 8, 2023 [ECF No. 49];

9 WHEREAS, the Motion asserts that Entropic has not met its evidentiary burden
10 to show that the Central District of California is a proper venue for this action as to
11 DISH Colorado;

12 WHEREAS, on May 12, 2023, the Parties filed a Joint Stipulation [ECF No.
13 51] to allow Entropic to conduct venue discovery in order to adequately respond to
14 the Motion’s arguments; particularly to investigate whether DISH Colorado has a
15 regular and established place of business in the Central District of California and
16 therefore whether venue in this District is proper under 28 U.S.C. § 1400(b);

17 WHEREAS, the Court granted the Joint Stipulation on May 16, 2023 [ECF No.
18 56];

19 WHEREAS, the parties have commenced venue discovery related to the
20 arguments presented in DISH Colorado’s Motion;

21 WHEREAS, on July 12, 2023, the Parties filed a Joint Stipulation [ECF No.
22 78] to extend deadlines regarding venue discovery and briefing schedule for DISH
23 Colorado’s motion;

24 WHEREAS, the Court granted the Joint Stipulation on July 13, 2023 [ECF No.
25 79];

26 WHEREAS, the Parties have met and conferred several times in order to
27 resolve discovery disputes. Such efforts include several written correspondence and
28

1 telephone conferences regarding the proper scope of Entropic's discovery requests,
2 the documents produced in response to such requests, and the dates of depositions to
3 be taken;

4 WHEREAS, the Parties continue to work together cooperatively to identify and
5 produce the relevant documents sought by Entropic, and to schedule depositions of
6 DISH Colorado and a subpoenaed third party;

7 WHEREAS, DISH Colorado has identified August 18, 2023, as a date on which
8 its corporate witness is available to testify;

9 WHEREAS, the subpoenaed third party has identified August 16, 2023, as a
10 date on which its corporate witness is available to testify;

11 WHEREAS, DISH Colorado has indicated that it intends to make a further
12 production of documents before the depositions described above;

13 WHEREAS, the Parties have agreed to jointly request the Court extend the
14 deadlines and hearing date related to the Motion to allow Entropic to complete its
15 venue discovery and file its Opposition to the Motion;

16 NOW THEREFORE, the Parties, by and through their respective counsel,
17 hereby STIPULATE AND AGREE as follows:

18 1. The Parties respectfully request that the Court agree to continue the hearing
19 on the DISH Colorado Motion from September 15, 2023, to October 6, 2023.

20 2. Consistent with the proposed new hearing date, the Parties respectfully
21 request that Entropic's deadline to oppose the DISH Colorado Motion be continued
22 to September 5, 2023, and that DISH Colorado's deadline to file a reply be continued
23 to September 22, 2023.

1 Dated: August 3, 2023

FISH & RICHARDSON P.C.

2
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Dated: August 3, 2023

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By: /s/ Christina Goodrich

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ECF ATTESTATION

I, Christina Goodrich, am the ECF User whose identification and password are being used to electronically file this Joint Stipulation. In accordance with Local Rule 5-4.3.4, concurrence in and authorization of the filing of this document has been obtained from the counsel of Plaintiff Entropic Communications, LLC will maintain records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request by a party.

/s/ Christina Goodrich
Christina Goodrich